

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 15 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
800 Database Access Tariffs and the) CC Docket No. 93-129
800 Service Management System)
)

SUBMISSION OF REVISED COST SUPPORT

As directed by the January 31, 1994, Order of the Acting Chief of the Common Carrier Bureau,¹ and without prejudice to its pending Application for Review,² Ameritech herein submits revised cost support for its 800 Data Base Access Service tariff. As allowed under Paragraph 14 of the Order,³ Ameritech has manually recalculated the investment costs for its basic and vertical queries⁴ to the best of its abilities so that its costs are no longer derived utilizing the Common Channel Signaling Cost Information System ("CCSCIS") model. The Supplemental Description and Justification, attached

¹ In the Matter of 800 Data Base Access Tariffs and the 800 Service Management System Tariff, CC Docket No. 93-129, Order, DA 94-99, rel. January 31, 1994 ("Order").

² Application for Review, CC Docket No. 93-129, filed March 2, 1994, by Ameritech et. al. (the "Application for Review").

³ Order, ¶ 14.

⁴ The costs included in this Submission support the call routing query (basic), the routing options query (vertical), and the carrier-ID query rate elements.

hereto, contains replacement Exhibits 4, 5 and 6 in the pending Ameritech Transmittal No. 698, and it demonstrates the validity of the originally filed costs.

To recalculate the total costs for 800 Data Base Access Service, Ameritech first identified all of the costs which had previously been developed utilizing the CCSCIS model, and then recalculated those costs manually using a simple analysis of the total 800 Data Base Access Service investment. Costs which had previously been developed without utilizing CCSCIS are merely repeated herein.

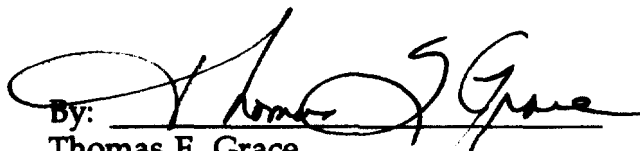
Ameritech was unable to manually determine the additional costs associated with a vertical query over a basic query. Since Ameritech has not used the CCSCIS model's information in this manual recalculation, Ameritech's only available information about resources associated with these types of queries was average record length (a vertical query record is roughly 40 times longer than the average basic query record). However, Ameritech was convinced that a vertical query didn't consume 40 times the resources of a basic query. Ameritech therefore chose to make its best guess about the incremental resources consumed by a vertical query, and ten percent (10%) seemed reasonable.

While Ameritech has manually recalculated its costs in accordance with the Order, Ameritech is concerned about the implications of the Order in the future. It is for that reason that Ameritech has joined in the Application for Review. Ameritech believes that forward-looking costs are appropriate for establishing new services tariff rates, but with the trend in the industry to greater sharing of network platforms by multiple service

applications and the flourishing of competition, the tension between maximum disclosure of information and accuracy of cost data will increase. It is conceivable that the next time this issue arises, costs might not be capable of manual recalculation. For that reason, a consistent set of rules allowing use of computer models which utilize vendor-proprietary information need to be established.

Respectfully submitted,

AMERITECH

By: 

Thomas E. Grace
2000 W. Ameritech Center Drive
Room 4H70
Hoffman Estates, Illinois 60196-1025
(708) 248 - 6040

Its Attorney

**SUPPLEMENTAL
DESCRIPTION AND JUSTIFICATION**

Pursuant to the Bureau Order in CC Docket No. 93-129, released January 31, 1994, Ameritech has elected to file revised cost support material which demonstrates the validity of the originally filed cost data which was derived utilizing the Common Channel Signaling Cost Information System (CCSCIS). While Ameritech disputes the reasons for disallowing our original cost support, this additional data is being provided to expedite the investigation of 800 database service. The costs included in this submission supports the call routing (basic) query, the routing options (vertical) query, and the carrier-ID query rate elements. All costs previously developed by the CCSCIS model have been calculated manually using a simple analysis of the total 800 database investment. All other unit costs are those that were previously submitted.

For Ameritech's manual calculations, the total investments in the SCP, the Regional STP and the connecting A-links were collected from Network data. Since this equipment is used to process both 800 Database and Line Information Database (LIDB) queries, the investment was allocated based on the percentage of 800 Database queries to total queries. The unit costs were developed by applying annual charge factors to these investments and dividing the annual costs by the forecast of queries. Revised Exhibits 4, 5 and 6 show results for 800 Call-Routing Query (Basic), 800 Carrier-ID-Only Query and 800 Routing Options Query (Vertical). Listed for each of these are the capital related investments, unit costs, and recurring expenses. These attachments replace Exhibits 4, 5, and 6 in pending Transmittal No. 698.

Additional network resources (within the SCP) are consumed to process a vertical query over a basic query, and the average vertical query record length is significantly longer than that of the basic query record. However, the additional SCP resources consumed to process a vertical versus a basic record do not have a direct correlation to the difference in record lengths. Ameritech was unable to determine the extent of additional SCP resources consumed without resorting to the CCSCIS model and its underlying vendor-proprietary information. Ameritech therefore assumed a 10% increase in SCP resources to process a vertical query. The result is that the vertical query cost is about 10% higher than the basic query cost.

The negligible increase in the 800 Call Routing Query resulted in a corresponding increase in the calculation of the exogenous cost. The new exogenous cost is \$6,347,095.

800 CALL-ROUTING QUERY (BASIC)

DIRECT UNIT INVESTMENT AND COSTS

Other Recurring Expenses	
NASC/SMS Total Annual Costs (levelized)	\$720,954
NASC/SMS Cost per Query	\$0.000132
Translations Total Annual Costs (levelized)	\$133,203
Translations Cost per Query	\$0.000027
Bellcore Funding/Other Total Annual Costs (levelized)	\$1,212,725
Bellcore Funding/Other Cost per Query	\$0.000236
Total Other Recurring Expenses	\$0.000395
TOTAL 800 CALL ROUTING QUERY COST	\$0.001639
DIRECT UNIT COST TO UNIT INVESTMENT	0.425825

Revised
Exhibit 5

**800 CARRIER-ID-ONLY QUERY
DIRECT UNIT INVESTMENT AND COSTS**

Investment per Carrier-ID-Only Query	\$0.001824
Cost per Carrier-ID-Only Query	\$0.000463
Other Recurring Expenses	
NASC/SMS Total Annual Costs (Levelized)	\$720,132
NASC/SMS Cost per Query	\$0.000132
Bellcore Funding/Other Total Annual Cost	
(Levelized)	\$1,212,725
Bellcore Funding/Other Cost per Query	\$0.000236
Total Other Recurring Expenses	\$0.000368
TOTAL 800 CARRIER-ID-ONLY QUERY COST	\$0.000831
DIRECT UNIT COST TO UNIT INVESTMENT	0.455592

Revised
Exhibit 6

**800 ROUTING OPTIONS QUERY (VERTICAL)
DIRECT UNIT INVESTMENT AND COSTS**

Investment per Routing Options Query	\$0.000385
Cost per Routing Options Query	\$0.000124
TOTAL 800 ROUTING OPTIONS QUERY COST	\$0.000124
DIRECT UNIT COST TO UNIT INVESTMENT	0.322078

CERTIFICATE OF SERVICE

I, Audrey L. Hankel, do hereby certify that a copy of the **SUBMISSION OF REVISED COST SUPPORT** has been mailed this 15th day of March, 1994, by first-class mail, postage prepaid, to parties on the attached service list.

By: Audrey L. Hankel
Audrey L. Hankel

***Thomas G. David**
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***Tom Quaile**
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***Kathleen B. Levitz**
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

***Mark Uretsky**
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***Gregory J. Vogt**
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***Peggy Reitzel**
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

***Judith A. Nitsche**
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***Gary Phillips**
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

***Steven Funkhouser**
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

***International Transcription
Services**
Room 246
1919 M Street, N.W.
Washington, DC 20554

* Hand Delivered

Robert C. Mackinchan, Jr.
Vincent L. Crivella
General Services Administration
Room 4002
18th & F Streets, N.W.
Washington, DC 20405

Gail L. Polivy
GTE Service Corporation
Suite 1200
1850 M Street, N.W.
Washington, DC 20036

Paul J. Berman
Ellen K. Snyder
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044

ATU

Roy L. Morris
Allnet Communication Services
Suite 500
1990 M Street, N.W.
Washington, DC 20036

James P. Tuthill
Robert Vavasour
Nancy C. Woolf
Pacific/Nevada Bell
Room 1525
140 New Montgomery Street
San Francisco, CA 94105

Jay C. Keithley
United Telephone Companies
Suite 1100
1850 M Street, N.W.
Washington, DC 20036

James L. Wurtz
Pacific/Nevada Bell
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Craig T. Smith
United Telephone Companies
P.O. Box 11315
Kansas City, MO 64112

William A. Blase, Jr.
Southwestern Bell Corporation
Suite 1000
1667 K Street, N.W.
Washington, DC 20006

Cindy Z. Schonhaut
Metropolitan Fiber Systems, Inc.
Suite 300
3000 K Street, N.W.
Washington, DC 20007

James B. Gainer
Ann Henkener
Public Utilities Commission
of Ohio
180 East Broad Street
Columbus, OH 43266

Henry D. Levine
Mary K. O'Connell
Levine, Lagapa & Block
Suite 602
1200 Nineteenth Street, N.W.
Washington, DC 20036

Joseph P. Markoski
Kerry E. Murray
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044

NDC

Mitchell F. Brecher
Terri B. Natoli
Donelan, Cleary, Wood & Maser, P.C.
Suite 850
1275 K Street, N.W.
Washington, DC 20005-4078

Richard McKenna
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Francine J. Berry
R. Steven Davis
American Telephone and Telegraph
Company
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

Stuart A.C. Drake
Kirkland & Ellis
Suite 1200
655 Fifteenth Street, N.W.
Washington, DC 20005

CBTC
SNET

Leon M. Kestenbaum
Morina T. Moy
Sprint Communications Company
Suite 1110
1850 M Street, N.W.
Washington, DC 20036

Larry A. Blosser
Carol R. Schultz
Donald J. Elardo
NCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

Genevieve Morelli
Competitive Telecommunications
Association
Suite 220
1140 Connecticut Avenue, N.W.
Washington, DC 20036

Danny E. Adams
Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Jeffrey W. Reynolds
Sugar Land Telephone
14141 Southwest Freeway
Sugar Land, TX 77487

Catherine R. Sloan
LDDS Communications, Inc.
Suite 400
1825 Eye Street, N.W.
Washington, DC 20006

M. E. King, Jr.
Nevada Bell
P.O. Box 11010
Reno, NV 89520

Andrew D. Lipman
Richard M. Rindler
Swidler & Berlin, Chartered
Suite 300
3000 K Street, N.W.
Washington, DC 20007

Robert B. McKenna
U.S. West Communications, Inc.
Suite 700
1020 19th Street, N.W.
Washington, D.C. 20036

Eric Fishman
Sullivan & Worchester
1025 Connecticut Avenue, N.W.
Washington, DC 20036

Ronald W. Barkby
Centel Telephone Companies
8745 West Higgins Road
Chicago, IL 60631

William J. Balcerski
NYNEX Telephone Companies
Room 427
120 Bloomingdale Road
White Plains, NY 10605

Robert A. Mazer
Nixon, Hargrave, Devans & Doyle
Suite 800
One Thomas Circle, N.W.
Washington, DC 20005

LINCOLN

Richard A. Askoff
National Exchange Carrier
Association
100 South Jefferson Road
Whippany, NJ 07981

Michael L. Glaser
Hopper & Kanouff, P.C.
Suite 200
1610 Wynkoop
Denver, CO 80202

Emmanuel Staurulakis
Thomas J. Moorman
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, MD 20706

CENTURY

William Page Montgomery
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108-2603

Randall B. Lowe
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, DC 20005-2088

Heather Burnett Gold
Association for Local Tele-
communications Services
Suite 1050
1150 Connecticut Avenue, N.W.
Washington, DC 20036

James S. Blaszak
Susan H.R. Jones
Patrick J. Whittle
Gardner, Carton & Douglas
Suite 900 - East Tower
1301 K Street, N.W.
Washington, DC 20005

AD HOC

Diane Smith
ALLTEL Service Corporation
Suite 1000
1710 Rhode Island, N.W.
Washington, DC 20036

Bob F. McCoy
Joseph W. Miller
John C. Gammie
WilTel, Inc.
P.O. Box 2400
Tulsa, OK 74121

Stephen G. Kraskin
Kraskin & Associates
Suite 810
2120 L Street, N.W.
Washington, DC 20037

CTO

Chillicothe Telephone Company
P.O. Box 480
Chillicothe, OH 45601-0647

Farmers Telephone Cooperative, Inc.
P.O. Box 217
Rainsville, AL 35986

Thomas E. Taylor
David S. Bence
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Fidelity Telephone Company
64 North Clark
Sullivan, MO 63080

Citizens Utilities Companies
High Ridge Park
Stamford, CT 06905

Great Plains Communications, Inc.
1626 Washington Street
Blair, NE 68008

Dunkirk and Fredonia Telephone
Company
P.O. Box 209
Fredonia, NY 14063

Hargray Telephone Company
P.O. Box 5519
Hilton Head Island, SC 29938

Elkhart Telephone Company
P.O. Box 817
Elkhart, KS 67950-0817

Illinois Consolidated Telephone
Company
121 South 17th Street
Mattoon, IL 61938

La Fourche Telephone Company, Inc.
P.O. Box 188
La Rose, LA 70373

Pineland Telephone Cooperative
P.O. Box 678
Metter, GA 30439

Lufkin-Conroe Telephone Exchange
P.O. Box 909
Lufkin, TX 75901

Josephine S. Trubek
Rochester Telephone Corporation
180 South Clinton Avenue
Rochester, NY 14646-0700

Millington Telephone Company, Inc.
4880 Navy Road
Drawer 429
Millington, TN 38083

Roseville Telephone Company
P.O. Box 969
Roseville, CA 95661

Mount Horeb Telephone Company
P.O. Box 65
Mount Horeb, WI 53572

Taconic Telephone Corporation
Taconic Place
Chatham, NY 12037

Northwestern Indiana Telephone
Company
P.O. Box 67
Hebron, IN 46341

Alan Y. Naftalin
Charles R. Naftalin
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, DC 20036

Union Telephone Company
P.O. Box 428
Plain Dealing, LA 71064

Helen Shockley
Shirley Ranson
BellSouth Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Vista Telephone Company
14450 Burnhaven Drive
Burnsville, MN 55337

Timothy Leahy
Paul Walters
Southwestern Bell Telephone
Company
Room 3330
One Bell Center
St. Louis, MO 63101

Vista-United Telecommunications
P.O. Box 10180
Lake Buena, FL 32830-0180

Eugene J. Baldrate
Southern New England Telephone
Company
227 Church Street
New Haven, CT 06510

Warwick Valley Telephone Company
Warwick Communications
5506 Detroit Avenue
Cleveland, OH 44102

A. W. Brothers
The Beehive Telephone Companies
P.O. Box 520
Wendover, UT 84083

John M. Goodman
Bell Atlantic Telephone Companies
1710 H Street, N.W.
Washington, DC 20006

William R. Tempest
DSC Communications Corporation
1000 Coit Road
Plano, TX 75075-5813

Stephen L. Goodman
Halprin, Temple & Goodman
Suite 1020-East Tower
1301 K Street, N.W.
Washington, DC 20005

NTI

Paul DeJongh
Northern Telecom, Inc.
P.O. Box 13010
Research Triangle Park, NC
27709-3010